Georgia Public Service Commission

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September 15, 2012

To: Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW/Room TW-A325
Washington, DC 20554

From: Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-5701

Subject: **CG Docket No. 03-123**

TELECOMMUNICATIONS RELAY SERVICE (TRS) STATE CERTIFICATION APPLICATION

Pursuant to the requirements of Title IV (Telecommunications) of the Americans with Disabilities Act (ADA) and the Federal Communications Commission's (FCC) Public Notice of June 25, 2012, the Georgia Public Service Commission (Georgia PSC, Commission or PSC) submits, on behalf of the state, the Georgia TRS State Certification Renewal Application. This submission is made by Georgia Public Service Commission as a result of its statutory responsibilities under Official Code of Georgia Annotated O.C.G.A §46-5-30.

This renewal application provides a brief history of the Georgia Telecommunications Relay Service (formerly the Dual Party Relay Service) and addresses the three requirements for certification listed by the FCC regarding TRS State Certification in the Public Notice of July 25, 2012:

(1) "The state program meets or exceeds all operational, technical and functional minimum standards contained in 47 C.F.R. §64.604;

(2) The state program makes available adequate procedures and remedies for enforcing the requirements of the state program; and

(3) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law."

The renewal application, as required, is in narrative form. Reference documents are appended as attachments.

Questions concerning this application should be directed to:

Michael Russell
TRS Coordinator, Utilities Division
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334
404.656.0995 (Voice)
404.656.0980 (Fax)
E-mail: MIKERU@psc.state.ga.us

Date

Tim F. Echols
Chairman
Georgia Public Service Commission

Telecommunications Relay Service
Application for Renewal of current Certification
State of Georgia

Submitted to:
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Room TW-A325
Washington, DC 20554

Submitted by:
The Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-5701

Provider of Service:
Hamilton Telephone Company
d/b/a Hamilton Telecommunications
1001 Twelfth Street
Aurora, NE 68818
402-694-3656 TTY/Voice
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TELECOMMUNICATIONS RELAY SERVICE
APPLICATION FOR RENEWAL OF CURRENT STATE CERTIFICATION

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Dial 7-1-1

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Introduction

Introduction

This is an application on behalf of the State of Georgia submitted by the Georgia Public Service Commission to have the Georgia Telecommunications Relay Service be certified as a Telecommunications Relay Service pursuant to the rules and procedures set forth by the Federal Communications Commission. The State of Georgia has been certified for the certification time period beginning July 26, 2008 and ending July 25, 2013.

Official notices, documentation and correspondence related to this application should be directed to:

Michael Russell, Utilities Analyst
Utilities Division, Georgia Public Service Commission
244 Washington Street SW
Atlanta, Georgia 30334
Voice: (404) 656-0995
Fax: (404) 656-2341
Email: MIKERU@psc.state.ga.us
Website: http://www.psc.state.ga.us

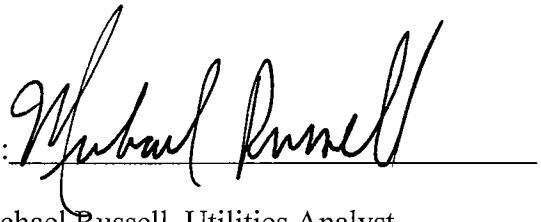
Operational questions about the center may also be directed to the following:

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1001 12th Street
Aurora, NE 68818
Voice/TTY: 402-694-3656
Toll Free: 800-618-4781
Fax: 402-694-5037
E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

Request for Renewal of Current State Certification

Wherefore, the Georgia Public Service Commission requests that the Federal Communications Commission certify the State of Georgia Telecommunications Relay Service provided through Hamilton Telephone Company in Aurora, Nebraska.

The Georgia Public Service Commission
on behalf of the State of Georgia

By: 

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Georgia Relay
Dial 7-1-1

Tab 2
Contract Status

TRS Contract Status

Hamilton Telephone Company d/b/a Hamilton Telecommunications is operating the Georgia Relay under contract with the Georgia Public Service. The term of the current contract is effective April 1, 2011 through March 31, 2014, with the option of a two-year extension.

Hamilton provides TRS service for the State of Georgia from an in-state center located at 2231-T Dawson Road, Albany, GA 31707.

The Georgia Relay provides users with a complete service package including all features and services as detailed in this filing. Training for Communication Assistants is continual. Georgia Relay has also developed an outreach program for the State of Georgia with a team of staff people devoted to this function.

Georgia Relay
Dial 7-1-1

Tab 3
Operational Standards

§ 64.604 Mandatory minimum standards.

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

(a) Operational standards –

(1) Communications assistant (CA).

(i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Recognizing that high quality Relay Communications Assistants ("CAs") are critical to providing consumer satisfaction, Georgia Relay thoroughly trains its Relay CAs to meet the specialized communications needs of individuals who are deaf, hard of hearing or have difficulty speaking. All Georgia Relay CAs possess clear and articulate voice communications. They have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with the various cultures of relay users, languages and etiquette. All Georgia Relay CAs provide a typing speed of a minimum of 60 words per minute, and Hamilton confirms this by giving oral-to-type tests of CA speed.

CAs are trained to relay calls in a manner that meets and often exceeds FCC standards. The following describes how Georgia Relay's service provider trains its CAs to meet operational proficiency standards stated above. Before hiring, exams are given to each applicant in the following areas to ensure that the candidate has the needed skills to become a fully trained Relay CA:

(1) Spelling skills (must achieve at least 90% correct)
(2) Reading skills (must be able to read clearly and distinctly)
(3) Typing proficiency

Additional details about these requirements are as follows:

Spelling Skills
The minimum spelling skill required of Georgia Relay Communication Assistants is the ability to quickly and easily spell words that are equivalent to that of a beginning college

level conversation. CAs must pass a spelling exam to be eligible to work as a Georgia Relay CA and score in at least the 90th percentile. The spelling skills exam is based on a 12th grade spelling level. Georgia Relay performs similar testing for Spanish CAs.

English Reading, Speaking, and Writing Skills
Communication Assistants must meet all grammar proficiency requirements including reading, speaking, and writing English Communication at a minimum of a 12th grade level prior to employment. Georgia Relay also tests for diction, clear and articulate voice communications and a neutral accent by requiring each prospective CA to complete a reading exam.

Typing Proficiency
Communication Assistants must type 60 words per minute (wpm) for five minutes. Georgia Relay exceeds this service level by requiring CAs to maintain a 95% accuracy level while typing 60 wpm. Georgia Relay's provider has an average typing speed of 68.9 wpm with 98% accuracy.

Newly hired CA are required to meet the Georgia Relay minimum typing proficiency standard on an oral-to-text exam within a three week period before they may take calls. Georgia Relay also tests its CAs every four months in a manner simulating actual working conditions to document current proficiency levels. If an CA is unable to meet the 60 wpm requirement, the CA is removed from live relay calls until further training and compliance can be accomplished.

Georgia Relay also uses a computer based typing program for continuing enhancement of keyboarding, spelling and grammar skills. This program is available to all CAs.

Georgia Relay performs test calls to document current proficiency levels of the CAs and to make sure each is making progress over the term of their employment. Conducting typing tests during live relay calls also ensures that Relay CAs are meeting all typing requirements during actual calls.

Training
All Georgia Relay staff, including management, receive 20 hours of initial training devoted solely to disability issues including ASL "gloss", ASL style and grammar, tone of voice, deaf, hard of hearing and hearing cultures, etiquette, pertinent information about the needs of people who are deaf or hard-of-hearing, the role of the CA (including training to relay the contents of a call as accurately as possible without intervening in communication) and operation of relay telecommunications equipment including answering machines and computerized services. This training is done through videos, seminars with staff who are familiar with the relay communities, observation (both simulated and on live calls), and a variety of role-play scenarios. CAs are well trained to effectively meet the specialized needs of relay users.

In addition to basic training during new hire training, Georgia Relay provides an additional 12 hours of specialized/cultural training annually.

Spanish language relay CAs must complete the same training as all traditional Relay CAs and must additionally pass tests confirming proficiency in the Spanish language.

Proficiency Examinations
Georgia Relay CAs begin relaying calls at the end of the three-week training period, assuming all examinations have been passed and proficiency skills have been shown. In addition to these exams and skill tests, CAs must successfully complete several relay call scenarios to demonstrate proficiency in simulated scenarios. Hamilton can then determine that a CA is meeting and exceeding all minimum FCC proficiency requirements. Tests are kept confidential and portions of the tests are changed routinely. CAs are tested on a variety of topics monthly to ensure that they continue to meet all requirements.

CA Performance Monitoring to Ensure Each CA Continues to Meet All Requirements
Through its provider's advanced relay platform, Georgia Relay has established a unique remote call monitoring system. Georgia Relay uses this call monitoring system to continually monitor call performance. Such items as proficiency and professionalism, procedures, language, voice quality, decorum, and professional knowledge and skills are evaluated daily.

Georgia Relay constantly monitors its CAs for quality control. Two formal call evaluations are completed each month, and informal "spot checking" is conducted every day to ensure that CAs are performing properly on calls.

Formal call monitoring includes observation of the call from start to finish. The CA either earns a passing or failing score in the applicable category. These monitorings are conducted by a Relay Supervisor and the Monitoring Supervisor. Two formal evaluations are required of each CA per month.

Through the call monitoring process, any CA not in compliance with quality standards is taken off duty for further training and re-testing. These CAs are put on probation and monitored frequently to ensure continued improvement.

> *(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.*

Georgia Relay does not change Communication Assistants during a call. Even at the end of shifts, over lunch hours, and other breaks, Georgia Relay CAs stay with a call until it is completed. Our experience has been that this provides much greater continuity for the user.

Georgia Relay exceeds the FCC standard for substitution of CAs for TTY-based TRS and STS TRS.

Georgia Relay only substitutes a CA if the following should occur:

- **A caller requests a change in gender of the CA**
  Georgia Relay CAs, when requested, will switch a call to another CA who is of the same gender as the caller and retain that CA for the user throughout the relay call.
- **Verbal abuse or obscenity is directed to the CA**
  If a relay user becomes abusive towards a CA (calling names, etc.) or does not give a number to dial, Georgia Relay's procedure is to send a hot key requesting the number to call three times, waiting approximately 20 to 30 seconds between each time the hot key is sent. If the CA is still being harassed or is not given a number to dial, a supervisor is called. The supervisor will try to process the call. If abuse continues or there is no response, a disconnect slip will be completed.
- **The call requires a specialist (Spanish language, speech to speech, etc.)**
- **A perceived conflict of interest exists or,**
- **A major emergency exists**

A change never takes place until either the calling or called party has completed their part of the conversation.

If a call does need to be transferred, another CA replaces the CA relaying the call at the same workstation so that the relay user's call is not interrupted (except to identify the new CA to both parties). A supervisor monitors the change and must approve the change based on the criteria listed above.

> *(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.*

Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call. Georgia's provider has the technical capability to automatically route calls to CAs of the preferred gender, if available, based on customer profile selection.

> *(vii) TRS shall transmit conversations between TTY and voice callers in real time.*

Georgia Relay transmits conversations between Relay and voice callers in real time.

(2) Confidentiality and conversation content.

> *(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the*

duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA toretain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Georgia Relay CAs are instructed not to disclose the content of any relayed conversation regardless of content, and to refrain from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. CAs are instructed not to intentionally alter a relayed conversation. To the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, CAs are instructed to relay all conversation verbatim unless the relay user specifically requests summarization or if the user requests interpretation of a call. Georgia Relay employs various methods to ensure that all relay users' confidentiality is maintained, including the restriction of access to its call centers and the partitioning of CAs into individual cubicles to ensure relay call privacy. All Georgia Relay employees must sign a confidentiality agreement committing to keep all information confidential.

All information about users is treated confidentially and will not be sold, distributed, shared, or divulged by Hamilton or any of its employees, unless divulging such information is compelled by lawful order.

(3) Types of calls.

(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service

providers have the burden of proving the infeasibility of handling any type of call.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

Georgia Relay does not and will not place any restrictions on the length or number of single or sequential calls placed by customers through the relay center. Georgia Relay will continue to manage its traffic loads in a manner that will not require that customers be asked to call back later.

Georgia Relay is capable of processing non-coin-sent paid calls, sent-paid calls, collect calls, person-to-person calls, international calls, hotel calls and calls charged to a third party. Georgia Relay is also able to process credit cards, any Georgia local exchange calling cards and all non-proprietary interexchange company calling cards that are accessed by dialing an 800 number. This includes all major interexchange company calling cards. Relay users simply inform Georgia Relay's CAs when they want to use an alternate form of billing. The CA selects the correct billing method from an on-screen menu and the call is then placed. The customer's carrier of choice actually bills the call (based on conversation time) as described previously, for intralata, interlata and international calls. Georgia Relay bills no calls and receives no revenue.

Coin Sent Paid

Georgia Relay is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls. The technology and networks between the common carrier network, payphones and relay do not allow for signaling to be passed so that a Communication Assistant can determine when coins have been dropped into the payphone. Furthermore, the FCC ordered that coin sent paid calls are not feasible.

Georgia Relay does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order.

Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call. The customer's carrier of choice will then rate and bills any long distance payphone calls. Once billing has been established the call will be processed as a regular relay call. In this manner, all relay users have access to anyone from a payphone.

Cellular/Wireless/PCS Phone Access

Georgia Relay is capable of processing relay calls that involve pagers, cellular and personal communications services. These services are all part of the Public Switched Network and they are handled just like any other relay call.

Workstations have built-in DTMF generating capabilities to perform dialing or access functions for relay users. The DTMF software sends tones that activate automated voice systems and pagers. With DTMF capability, Georgia Relay can navigate voice menus,

answering machines, or any other automated system that either record or passes on voice, text, or electronic message to the other party even when using a wireless device.

The relay switch identifies wireless calls with a false ANI associated with it and Georgia Relay processes the call as "no bill" preventing the relay user from having to use alternate form of billing. One exception is when false ANI information is forwarded. Although infrequent, this situation would require the CA to ask for an alternate form of billing.

Directory Assistance
Georgia Relay gives all relay users access to local, intrastate and interstate directory assistance services via the relay and processes directory assistance requests in the same manner as any other relay requests.

Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies the relay and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

End User Billing for Directory Assistance
The relay user can pick which carrier they want to use for directory assistance. The relay user's carrier of choice bills for interlata and intralata directory assistance calls at their tariffed rate. With intralata presubscription, all billing is performed by the customer's carrier. All directory assistance calls are sent to the customer's carrier of choice for processing and billing. Georgia Relay does not set any rates for long distance or operator assisted calls since the customer's carrier of choice bills these calls. All directory assistance calls are billed via the customer's long distance carrier.

Network Access
Georgia Relay's system provides for and serves all of the following types of calls.

(1) Local calls originating and terminating within Georgia, including EAS and optional calling plan calls

(2) Intralata, interstate calls which are considered local calls – Billed to the TRS Interstate Fund

(3) Intralata calls originating and terminating within Georgia

(4) Interstate calls that originate within Georgia and terminate outside of Georgia - Billed to the TRS Interstate Fund

(5) Interstate calls that originate outside of Georgia and terminate in Georgia - Billed to the TRS Interstate Fund

(6) Interstate calls that originate outside of Georgia and terminate outside of Georgia - Billed to the TRS Interstate Fund

Georgia Relay 800 numbers, including 711, will be able to place the call types listed above. Georgia Relay's service is designed so that all calls made through its relay centers are billed from the originating telephone number to the terminating telephone number as if the call were made directly with no relay intervention. The relay platform stores the necessary information about extended area service and optional calling plan arrangements in Georgia so that calls made within an EAS area or optional calling area are not billed to the customer. ANI information appears at the workstation automatically and the terminating number is keyed in by the Communication Assistant so that a billing record can be created. For calls originating in areas where ANI information is not forwarded, Georgia Relay 's Communication Assistants will key in originating number information.

Local and Intrastate Relay Calling

Georgia Relay provides local and intrastate calling to the users of Georgia Relay and has obtained the necessary information (NPA/NXX) to build a database to identify the difference between local and intrastate calls (this includes expanded local information).

Georgia Relay's provider has contacted the LECs within Georgia to collect all EAS and local optional calling plan information. Once this information was gathered, Georgia Relay's provider updated its database within its switching platform and its toll processing system to identify certain NPA-NXXs as toll-free calling areas. Relay users with access to optional calling plans will not be billed any more for calls to the specific optional calling area than if they would have called directly through their local network.

The calling party's ANI is compared to the called number. Georgia Relay's relay database determines if it is a local or intrastate toll call and gives the Communication Assistant notification if billing information is required. If it is a local call, no billing arrangements are necessary and there are no charges. If it is a toll call, Georgia Relay sends the call to the customer's carrier of choice for billing purposes.

The entire call process and CA procedures are designed to make the relay center seem invisible. To the relay user, a call looks like it was placed from his or her primary location to the call destination. Relay users do not see or get billed for the "links" going to and from the relay center. Relay users receive no billing for local calls. Intrastate/intralata calls are billed by the customer's carrier, as described further in this Section.

Access to Regionally Directed Toll-Free Numbers

Georgia Relay allows access to regionally directed toll-free numbers. Because Georgia Relay passes true Caller ID information, the caller's ANI reflects a Georgia number which results in the call being routed to the correct state or regional location.

Access to Restricted Toll Free Numbers
The service provided by Georgia Relay allows access to restricted 800 numbers and other special prefixes. Georgia Relay is providing this service today through an incumbent LEC via re-originating dial tone. Georgia Relay makes sure that all of the relay users in Georgia have access to all 800 numbers and other special prefixes.

Access to Businesses with Special Prefixes
Georgia Relay understands that some local telephone companies have abbreviated numbers available for services calls. Georgia Relay will continue to work with LECs to ensure proper routing and will allow Georgia relay users to access businesses with special prefixes.

Extended Area Service
Georgia Relay's provider has obtained the needed local calling area information from the Georgia LECs and routinely updates this information. This includes any EAS and/or local optional calling plan data. This data is collected through letters, telephone calls, and meetings with the LECs in Georgia.

Georgia Relay's provider also makes use of the Terminating Point Master (TPM) from Telcordia to verify Latas, as well as vertical and horizontal positions, which are necessary elements in determining mileage and jurisdictions. Georgia Relay's provider uses the TPM to define call jurisdictions by linking the calling and called numbers to geographic data tables that contain NPA-NXX information, identifying intralata, interlata, or local/EAS. The jurisdiction is also defined at the workstation during the actual call. Georgia Relay's provider updates the TPM file monthly.

Interstate and International Calls
Georgia Relay provides interstate and international calling to Georgia Relay users. Interlata (including interstate and international) and intralata long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interlata and intralata long distance calls. On each interlata and intralata call, Georgia Relay forwards the appropriate information digits, calling number and called number as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

When a call has been defined as a long distance call, Georgia Relay sends this call to its relay switching tandem. The customer's selected carrier code is sent with each call so that the tandem sends the call to the customer's carrier of choice. Each call is identified as a relay call. If a relay user has signed up with his/her carrier of choice for a "relay" discount or the carrier is required to give a relay discount, the carrier will bill the call as a relay call and apply any discounts. Georgia Relay users will receive one bill from their carrier of choice just like they do for all of their direct calls. Georgia Relay explains this type of billing arrangement through all Outreach and Customer Service activities, in newsletters, relay materials, etc. so that relay users understand how to select a carrier and find the best long distance rates.

The section below (under the heading End User Billing for all Toll Calls) contains a description of how end users are billed for toll calls.

Inbound International Calls

Georgia Relay provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Georgia Relay then places the outbound call to a destination in the United States free of charge and relays the conversation for them. All processed International calls are billed to the Interstate TRS Fund Administrator.

End User Billing for all Toll Calls

Interlata (including interstate and international) and intralata and intrastate long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interstate and intrastate long distance calls. On each interlata and intralata call, Georgia Relay forwards the appropriate information digits, calling number and called number as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

Georgia Relay forwards information on each toll call to the relay user's carrier at the time the relay call actually takes place. The record will contain: the originating and terminating numbers and the call type (e.g., person-to person, collect). Interlata and intralata billing records will be created by the interexchange carrier as a result of the information digits and calling and called number data being sent to the interexchange carrier at the time the call is made. Long distance charges are based on the originating and terminating numbers. The long distance carrier bills are based on conversation time using their own rounding calculations. Georgia Relay does not pass on session time to the carrier so only conversation time is billed by the carrier. Billing and collection is then the responsibility of the interexchange carrier who carries the call.

Georgia Relay's provider has the unique advantage in the industry of being a relay provider which is not an IXC. The customer's carrier of choice actually bills the call (based on conversation time) for intralata, interlata, and international calls. This means that the timing of the call for billing purposes begins immediately upon pickup at the called number. If a caller requests a person-to-person toll call, the timing begins only after the requested person has answered the call. If a relay user has signed up with his/her carrier of choice for a "relay" discount or the carrier is required to give a relay discount, the carrier will bill the call as a relay call and apply any discounts. Georgia Relay bills no calls and receives no revenue. All billing is performed by the carrier.

The format of the bill for all toll calls will be determined by the carrier as Georgia Relay does not bill any relay calls. However, the call digit information will identify the call as a TRS call and will further designate the type of call (i.e. 3rd

number call, direct dial call, collect call, and person-to-person call). This will allow carriers to correctly identify each relay call on their bill.

All billing to the relay user is based on minutes of conversation and is processed by the relay user's carrier of choice.

Georgia Relay has the ability to place the following call types:

Bill to ANI	Person to Person
Third Party	PP - Bill to ANI
Collect	PP – Third Party
Calling Card/Credit Card	PP – Collect
Prepaid Calling Cards	PP – Calling Card/Credit Card

Automated Billing System to Determine Call Jurisdiction

Georgia Relay's provider makes use of an automated billing system to determine call jurisdiction. Georgia Relay's provider marks on every billing record whether the call is local, EAS, intrastate or interstate. This is done immediately when the call is placed. Georgia Relay's provider performs a second check of call jurisdiction during the monthly settlement process. By determining the jurisdiction of every relay call twice, Georgia Relay's provider can guarantee that call jurisdictions are established correctly and that Georgia Relay will only pay for intrastate relay minutes. In addition to redundant jurisdiction look-ups, Georgia Relay's provider also accounts for every minute of relay use. This means that all reports must balance at the end of every month in each jurisdiction category. This additional safeguard ensures that all minutes are accounted for correctly.

(iv) Relay services shall be capable of handling pay-per-call calls.

Pay-Per-Call Services

Georgia Relay allows relay users to access intrastate and interstate 800 or 900 pay-per-call services in which the company providing the service bills the end-user directly. Georgia Relay has established the necessary trunking to the carriers participating in relay equal access so that the carrier can bill directly for this call.

Georgia Relay's provider bills the Interstate TRS Fund and the Georgia Public Service Commission using the percentage split defined by the Interstate TRS Fund Administrator for 800 and 900 calls. Customers may choose to block 900 calls from being made altogether via forms provided by Georgia Relay.

(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

TTY/ASCII to Voice
Georgia Relay is able to accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

Voice Call Processing
Georgia Relay is able to accept a call from a hearing and voice capable caller, place a call to a text based caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link.

Voice Carryover (VCO)
Georgia Relay allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are also available through Georgia Relay.

Two-Line VCO
Two-line VCO capability allows a VCO user to have a more interactive conversation. By using two telephone lines the caller, if they have some hearing available, can listen to their conversation on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

Reverse Two-Line VCO
Hamilton's Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

VCO-TTY and TTY-VCO
Georgia Relay provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

VCO-VCO
Georgia Relay provides VCO to VCO service where the CA types to both parties, saving the VCO users from having to type their part of the conversation.

Hearing Carryover (HCO)
Georgia Relay allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are also available through Georgia Relay.

Two-Line HCO
To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

HCO-TTY and TTY-HCO
Georgia Relay provides his feature allowing HCO users to contact TTY users (or vice versa) via the relay.

HCO-HCO
This service allows two HCO users to contact each other through the relay. Georgia Relay provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation.

> *(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.*

TTY to TTY (Call Release)
Georgia Relay processes TTY to TTY calls for Relay users, in which the CA remains on the line until both parties have disconnected.

Speed Dialing
Relay users may choose up to 50 numbers they would like programmed for speed dial. When a Relay user makes a call to a number on their speed dial list, they first connect to the CA and just tell the CA, "pls call Mom". Speed dialing is available through the Georgia Relay customer profile.

Three-Way Calling
Georgia Relay provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

> *(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.*

Machine Recording Capabilities
Georgia Relay's recording function allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of a hot key on the CA's terminal that a recording has been reached, followed by another hot key stating (CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the CA types, "HLDING FOR DEPT/PERSON" and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the CA sends a hot key that states, "COLLECTING INFO PLS HLD" and the CA continues to collect the recording.

The message is retained only for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system.

When Georgia Relay has to redial to an answering machine, voice mail, interactive voice messaging unit or any other type of recording system, for whatever reason, Georgia Relay does so without billing the customer for any subsequent long distance relay calls.

> *(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.*

Answering Machine and Voice Mail Retrieval
Communication Assistants are trained in retrieving and relaying TTY messages to voice users and voice messages to TTY users from voice processing systems. Communication Assistants use the following procedures to obtain messages for relay users:

1. The user is informed that the Communication Assistant has reached a voice processing system.

2. If the user requests message retrieval, Georgia Relay obtains the appropriate access codes from the user. Georgia Relay does not retain access codes or any other information needed to access a voice mail system subsequent to the call. This information is considered "call" information and just like any other call information, is kept confidential.

3. After the voice processing system has been accessed, Georgia Relay Communication Assistants begin to relay any messages that have been recorded or leave a message as requested. Georgia Relay makes use of its advanced recording function to capture this information as discussed previously.

4. If the Communication Assistants must call again to finish relaying any messages, Georgia Relay Communication Assistants do so without billing the end user for subsequent calls.

Georgia Relay alerts relay users to the presence of a recorded message and/or interactive menu. Georgia Relay uses hot keys (automatic macros) to announce recordings or interactive messages. Georgia Relay does not charge a relay user for subsequent calls to a recording or to interactive message.

Answering Machine Retrieval (Single-Line)
Georgia Relay provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistant by putting the handset near the speaker of the answering machine. Georgia Relay records any messages, enabling the Communication Assistant to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

Procedure for Handling TRS Emergency Calls
Georgia Relay's provider uses a national Emergency Call Relay Center, operated by Intrado, Inc., for the provision of handling emergency relay calls.

Georgia Relay uses Intrado and follows the procedures below:

- If the caller has the local emergency number which needs to be accessed, the call is promptly placed and handled in the same manner as any other relay call.

- In the event that a caller does not have the access number to 911 and the emergency appears to be of a nature that time will not permit the caller to hang up and call directly to 911, the CA will contact the Emergency Call Relay Center (ECRXC) which is accomplished through one stroke on the keyboard.

- Simultaneously, the CA obtains the address from which the person is calling from and selects the "emergency call" box option on the software at the workstation. (A Supervisor assists every 911 call. When a Communication Assistant makes this selection, a Supervisor is notified immediately as a flag indicator on the Supervisor Console is activated.)

- Once connected to the ECRC, the CA will identify as a TTY relay call and relay the location of the caller. (If the CA does not obtain location information, the CA gives the ECRC the ANI of the caller.)

- The ECRC immediately transfers the call to the appropriate PSAP center. The ECRC drops off the call once confirming that both parties are on the line and the correct PSAP has been reached. The CA processes the call as normal.

- Georgia Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

Back-up Emergency Procedures
As a back-up to Intrado in the event that Intrado is unable to match the caller with the appropriate PSAP, Georgia Relay's provider has procedures in place to access its own emergency database:

- The software used by Georgia Relay takes the NPA/NXX information from the ANI of an incoming call and matches it to information in its database. The ANI indicates what city or location a call is coming from. This NPA/NXX information is then cross-referenced to a list of locations in Georgia stored in the database. Georgia Relay has mapped each NPA/NXX in Georgia to the appropriate PSAP. Once this search is complete (it only takes a second) the correct emergency telephone number is loaded automatically into the "outdial" box and the Communication Assistant can immediately dial the appropriate emergency personnel. This process ensures that Georgia Relay users have access to the correct and appropriate PSAP.

- Georgia Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

- If the caller is using a cellular or wireless phone, the ANI is not a good indication of where the caller is actually positioned. In this case, the CA asks for the nearest city name and initiates an automated search for the appropriate PSAP. If several PSAPs are listed for the same city, the CA will try to identify the correct one with a quick question to the caller.

- Georgia Relay's emergency database application described above meets the current requirements established by the FCC.

FCC Rules for Emergency Calls
In the June 2004 order, the FCC adopted the definition of "appropriate" PSAP as "either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner." Georgia Relay's database automatically and immediately transfers the caller to the appropriate Public Safety Answering Point based on NPA/NXX information.

The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Georgia Relay accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP:

1) through the use of Intrado's 9-1-1 infrastructure and

2) through the PSAP database maintained by Georgia's provider.

TTY to TTY Communications Between PSAP and Caller
Georgia Relay will process direct TTY to TTY communications between the PSAP and the TTY caller.

If a Caller Disconnects Before Being Connected to the PSAP
In the event that a caller disconnects before being connected to the PSAP even if the CA is unable to get the number of the caller before the call is disconnected, the workstation contains a notification feature that initiates a command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information if needed, so no matter when the caller hangs up, Georgia Relay can send the correct ANI information to the 911 center.

The Supervisor will contact the appropriate 911 center and give the dispatcher any pertinent information collected on the call. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from.

During the course of emergency 911 calls, the CA continually solicits as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the CA may have an opportunity to seek out the appropriate emergency assistance. The CA then gives the dispatcher any pertinent information collected on the call even if the originator of the call has disconnected. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from. This meets the FCC's current requirement where a CA must pass along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help.

The emergency call plan used by Georgia Relay follows this section. This covers the scenario of a relay user disconnecting before the call is completed. If the 911 call is completed, the CA will follow normal relay procedures with the assistance of a supervisor and the caller's ANI is transferred to the appropriate PSAP as described above.

911 Procedures if the caller disconnects before the emergency call to the PSAP is completed:

Call the 911 Dispatch number that is listed in the Emergencyfile.txt or the emergency dispatch numbers file ASAP (all of this is immediately available on the CA's workstation screen). Remember this is a 911 call.

When you reach the 911 dispatch operator use the following steps:

1. **Greeting**: This is "CA XXXX" from "State" Relay Center. We just received a 911 call that wasn't completed. The caller uses a TTY and may be Hard of Hearing, Speech Disabled, or Deaf. The ANI is XXX-XXX-XXXX.
2. Ask the 911 dispatch operator if they have a TTY. If they do not proceed to item "3". Ask if they know how to use the TTY. If they don't know how to use the TTY proceed to item "3". If they know how to use the TTY proceed to item "5".
3. Give the 911 dispatch operator the Voice relay number for the correct state.
4. Ask the 911 dispatch operator if they know how to use the relay.
   - Relay Explanation
     The person you are calling through relay will be typing their conversation and the CA will read it to you.
5. Ask the 911 dispatch operator for their name or operator number. Record this information on the CA's Emergency Call Slip.

Through its outreach programs and outreach materials, Georgia Relay educates relay users about how to use 911 services. As a part of this information, Georgia Relay encourages relay users to call 911 direct and to contact their local emergency service personnel using a TTY to ensure that the 911 center will process a TTY call correctly in the event of an emergency.

In addition, Georgia Relay gives presentations to 911 centers routinely as part of its outreach program. Georgia Relay provides training and other assistance to emergency dispatchers to ensure TTY calls or relay calls are handled correctly.

> *(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.*

Speech to Speech

STS service allows individuals with a speech disability to use his/her own voice or a speech synthesizer when using the relay. STS users are able to communicate with any and all relay users including but not limited to VCO, HCO, TTY, 2LVCO, other STS users or standard phone users. Specially trained CAs process Speech to Speech calls. STS is also available in Spanish.

Georgia Relay's provision of Speech to Speech meets all FCC requirements for Speech to Speech call processing.

STS CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention as required by the FCC.

Georgia Relay provides STS users the same profile and all of the features contained within that profile which are currently available to other relay users. Georgia Relay has a feature, which allows all relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the CA. The CA repeats the name and states the number of the person to call. The Speed Dial feature is of great benefit to STS users.

Georgia Relay complies with the 15-minute requirement prior to changing STS CAs. A Supervisor must approve and facilitate a STS CA change. Georgia Relay exceeds the FCC standard for substitution of STS CAs.

If a change in STS CA is necessary, another CA will replace the CA relaying the call at the same workstation so that the relay user's call is not interrupted except to identify the new CA to both parties. The replacement STS CA will announce, "This is CA# ____continuing your call." A supervisor monitors the change and must approve the change based on the caller's request or emergency circumstances.

All STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. This information is retained only for the duration of the inbound call. STS CAs retain any important information given by the STS user which might be difficult for the STS relay user to repeat (i.e. credit card numbers, telephone numbers, account numbers, etc.) for use in a subsequent outbound call. Georgia Relay places a great emphasis on maintaining the confidentiality of relay users. As a result, all information is destroyed immediately upon termination of the inbound call. The above meets all FCC requirements for Speech to Speech call processing.

Georgia Relay
Dial 7-1-1

Tab 4
Technical Standards

§ 64.604 Mandatory minimum standards.

(b) Technical standards –

(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Georgia Relay is capable of receiving and transmitting using Voice, Turbo Code, ASCII or Baudot formats, at any speed generally in use. All equipment is compatible with industry-wide standards. The modems used by Georgia Relay can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly.

(2) Speed of answer.

(i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Georgia Relay is committed to complying with the speed of answer requirements applicable to relay. Georgia Relay answers eighty-five percent (85%) of calls within ten (10) seconds and 97% of all calls within 30 seconds from the time the call enters the TRS system during all times

of the day by any method which results in the caller's call immediately placed, not put in a queue or on hold.

Georgia's Relay provider begins measuring Average Answer time from the moment a Relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as the equipment used by Georgia's Relay provider accepts the call, call detail records start to capture answer time data. Georgia Relay's timing is very accurate as no rounding takes place since this time is measured in seconds. The information reported is taken from Call Detail Records ensuring the accuracy of the data. Each call detail record tracks the amount of time a call waits to be answered. Georgia Relay's CAs do not answer a call until they are ready to engage the call. Calls in queue or calls receiving the intercept message are not counted as answered. This "queue time" field will be analyzed and reported, but not billed. Abandoned calls are included in the speed of answer calculation.

Georgia Relay has the ability to monitor speed of answer on a real-time basis via a monitoring system that is accessible to management and supervisors. This information is utilized to make CA staffing changes throughout the day. Average Answer time is displayed on the supervisor console. The Supervisor workstation and reader boards in the center indicate if calls are in queue waiting to be answered. The Supervisors are responsible for making sure that when that alert comes up that all available CA resources are logged in to the system and answering calls. Each of these tracking mechanisms allows Georgia Relay to respond quickly by adding more CAs immediately.

Daily activity reports used for internal management purposes also track answer performance information for future scheduling. In addition, Georgia Relay uses a variety of other scheduling techniques to ensure that staffing meets traffic demands. Georgia's Relay provider makes use of historical data, trending, call patterns and combines that with the knowledge of current events (e.g. football games, weather, Mother's Day, etc.) to anticipate staffing needs.

Georgia Relay has outstanding answer performance. Average answer seconds for the past year were 0.3 with 98% of calls answered in ten seconds or less.

Georgia Relay also meets all FCC call blockage standards. Georgia Relay's relay service is designed to a P.01 standard. No more than one call in 100 will receive a busy signal when calling the relay center at the busiest hour. Georgia Relay defines "blockage" as any call that arrives at the relay switch but is not answered due to the customer receiving a busy signal. Currently, Georgia Relay has never come close to blocking 1 call in 100.

The systems used by Georgia Relay's are designed to prevent blockage. The switches used are high-speed, stand-alone, non-blocking digital switching matrixes. The system is fully redundant to ensure quality and reliable performance, making blockage or any downtime nearly impossible. The system auto-detects any problems and moves to the secondary system immediately if necessary.

Another measure Georgia Relay has taken to prevent blocking is to use networks that make use of SONET survivability technology. All of the networks controlled by Georgia Relay - from the

point a relay user picks up the phone in their home or business, through the relay and then back to the other phone being called - are redundant and can survive fiber cuts and other such outages.

Georgia Relay measures, records and reports its answer performance and blockage rate information to the PSC and abides by the FCC rules (i.e. a LEC shall provide the call attempt and the rates of calls blocked between the LEC and the relay center upon request).

The transmission circuits used by Georgia's provider meet or exceed industry interexchange performance standards for circuit loss and noise.

> *(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.*

Equal Access (Carrier of Choice)

Georgia Relay provides relay users with access to the interexchange carrier of their choice through TRS, and to all other operator services, to the same extent that such access is provided to voice users. Interlata and intralata long distance toll charges are recorded and billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for long distance calls made without the relay. On each interlata and intralata call, Georgia Relay forwards the appropriate information digits (identifying the call as a relay call), calling number and called number as part of the call information so that the long distance company can bill the customer at correct functionally equivalent rate through their normal billing mechanisms. Calling card or credit card billing is handled in the same manner. Georgia Relay's provider has provisioned the necessary trunks at each of its relay switching tandems for all long distance companies participating in equal access so that they can receive Georgia Relay traffic. Georgia Relay offers equal access to all carriers who choose to participate.

Georgia Relay provides relay users with access to all other Operator Services to the same extent as that provided to voice users. Operator services are handled in the same manner as explained above. All operator assisted calls are sent to the customers' carrier of choice for processing and billing.

The type of arrangement explained above gives the control to the relay user. The relay user can pick their carrier of choice, receive one bill for all of their calls, and the relay user can shop for the best rates, just like they do today for calls not made through the relay. The relay user can continue to work with one carrier and the relay remains invisible.

The customer profile program used by Georgia Relay is based on the relay users' ANI that provides automatic connection to the carrier of choice for both interlata and intralata calls made by the relay user. Relay users complete a customer profile with their carrier information and Georgia Relay adds this information to its database. On each subsequent relay call relay users are automatically connected to their carrier of choice. Relay users can also notify the CA of their carrier of choice when making a long distance relay call. In the event a relay user elects to change his/her carrier of choice, the CA is able to do so.

Georgia Relay offers 1010 dialing through the relay. This service is functionally equivalent to using 1010 services when not placing calls through the relay.

In order to obtain new carriers on its platform, Georgia Relay contacts all carriers that are requested by Georgia relay users to see if they will participate in relay equal access. Georgia's Relay provider then works through ordering and testing phases with that carrier to ensure that the carrier becomes available to Georgia relay users. Georgia's Relay provider maintains a list of participating long distance carriers and makes this information available to relay users.

(4) TRS facilities.

(i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

Georgia Relay provides telecommunications relay service 24 hours a day, 7 days a week. .

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

The facility used by Georgia Relay has the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. Georgia Relay is operated from an in-state center located in Albany, Georgia. Georgia Relay calls automatically overflow during peak volume times and during any failure of switching or telecommunications facilities to other centers operated by the Georgia relay provider. This ensures continuous operation of the Georgia Relay.

The switches and relay platforms used by Georgia Relay's provider's are located in the Louisiana and the Nebraska relay centers. Workstation equipment, database information, and CA are located in all relay centers. Workstations in the Maryland and Massachusetts centers are controlled by the main processing and switch unit located in Nebraska via digital telecommunications facilities which are redundant T -1 circuits. Workstations in the Georgia Center are controlled by the main processing and switch unit located in Louisiana via digital telecommunications facilities which are redundant T -1 circuits. All incoming relay calls enter the relay provider's network. Calls can then be connected to workstations in any of the Relay provider's facilities. This all happens instantaneously with no call delays. Calls made to the terminating party exit through the call network as well. Georgia Relay users receive outstanding call processing and superior answer performance as a result of this network configuration.

Uninterruptible Power

All relay centers operated by Georgia's Relay provider make use of an uninterruptible power source with full battery backup to operate each center at full capacity for extended periods of time. In addition, battery back-up systems have the capability to automatically connect to a generator at each of its existing relay centers. The combination of battery and generator back-up allows Georgia Relay's provider to provide relay service for days and weeks at a time during power outages.

The power system supports the switch system and its peripherals, switch room environmentals (air conditioning/heating, fire suppression system, emergency lights & system alarms), CA consoles/terminals, CA work-site and lighting and Call Detail Record recording at each center. Employees are given procedures to follow in the event of emergency.

Georgia's Relay provider provides auxiliary power sources for nine central offices in addition to all its relay centers and has significant experience at purchasing, installing, testing and insuring that such back-up equipment is in place. All of Hamilton's back-up power systems have redundancy features functionally equivalent to the equipment in normal central offices including uninterruptible power for emergency use.

Switching System

Georgia Relay provider's second generation relay platform makes use of an Excel telecommunications switch. Its switch is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allow for simplified and cost-effective application development. The switch supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, Digital Signal Processing service cards and SS7 packet engine cards. The switch adapts to all standard network and line interfaces, including Tl, El, 11, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the Excel Inc. programmable switching platforms. The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records.

The ISOS is a fully operational basic switch and has great flexibility. Georgia's Relay provider took advantage of this flexibility and has customized many relay functions in the ISOS operating system.

The relay workstation application takes advantage of the power and flexibility of the ISOS operating system. It provides a high level of Communication Assistant control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database was developed to maintain a profile of each caller to speed up call connections and to provide information for tailored call processing. The switching systems contain a fully redundant central processing unit on hot standby with automatic failover. This is to ensure that no calls are dropped due to technical failure. It also has a redundant power supply on hot standby. Backup control and database servers are also on hot standby with automatic failover. Georgia's Relay provider maintains an inventory of spare critical components for the switching system onsite to ensure that the required levels of service are met (listed below).

The on-sight switching system spare equipment includes:

- D4 channel bank
- All required channel bank cards

- T1 CSU packs
- Switch T -1 card
- Switch conference card

If one of the switching systems cannot be returned to service by transferring control to redundant equipment, the calls automatically will overflow to another switching system. The switching systems are designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. Each fully redundant control system, which includes keyboard, monitor and printer capabilities, is used to control and monitor each of the switching systems. The control systems provide online system monitoring and real-time programming capabilities that will not take the system off-line and the ability to perform preventative maintenance or repair while the system is online. Remote capabilities are also provided so the system can be remotely monitored, reconfigured or controlled as necessary. All of this is provided to ensure the required levels of service are always met.

Georgia's Relay provider has made changes to its relay platform in recent years, making use of leading edge technology. It has upgraded its switching servers to new hardware that evolved its switching operating system from 32 bit UNIX to 64 bit Linux for more robust hardware support; and tested and deployed new switching control code which allows additional ad hoc reporting capabilities for comprehensive traffic analysis and enhanced failover and recovery. Georgia's Relay provider has also replaced database servers with new hardware and replaced legacy profile database servers with SQL servers for improved redundancy and database management. Finally Georgia's Relay provider has completed a multi-year upgrade of all production workstations to newer, standardized hardware; upgraded workstation operating systems from 16 bit to 32 bit which provides a higher level of stability; and rolled out several new workstation versions to support a variety of new features.

> *(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.*

Upgrades in Technology/Process in Determining of Technology is Reliable
Using flexible software and hardware (i.e. standard carrier switch, common equipment frames, standard T1 interfaces, windows servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, the platform used by Georgia Relay is ideal for today's rapidly changing technologically advanced environment. Georgia Relay's provider takes advantage of innovations and technological improvements to enhance the state of Georgia's relay service.

Signaling System Seven (SS7)
The relay platform used by Georgia Relay has made use of SS7 signaling since February 2002. The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. Georgia Relay provides true

Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

> *(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.*

True Caller ID

Through the use of SS7 signaling Georgia Relay provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box. Georgia Relay provides this information on all call types and on all carriers. Georgia Relay brings true functional equivalence to Caller ID relay users.

Georgia Relay receives and passes calling line identification information, including blocking information from all users calling through the relay service.

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Tab 5
Functional Standards

§ 64.604 Mandatory minimum standards.

c) Functional standards —

(1) Consumer complaint logs.

(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

Georgia Relay tracks all TRS complaints and all other customer service activity. Georgia Relay maintains a log of consumer complaints alleging a violation of federal minimum standards as it relates to the provisioning of Telecommunications Relay Service and retains the log for the State until the FCC grants the next application for certification.

All complaints made through the toll-free Customer Service number, the customer inquiry form or on-line feedback form, whether in writing or in person, are documented in the Customer Service database. All resolutions are also documented in this database. **All information is kept on file and available to the PSC and FCC.** Each database record includes the name and/or address of the complainant, the date and time received, the Communication Assistant identification number, the nature of the complaint, the specific relief or satisfaction sought, the result of the investigation, the resolution of the complaint and date of the resolution. The customer service representative responsible for handling the complaint is also indicated.

The PSC's complaint log consists of the following database categories:

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Improper Handling of Three Way Calling

- Caller ID Not Working Properly
- Improper Use of Customer Data
- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breech
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems
- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access
- CapTel Complaints

> *(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.*

Georgia Relay's provider reports complaint activity to the PSC on a monthly basis. The PSC submits the necessary information to the FCC as required in § 64.601 Mandatory Minimum Standards on an annual basis. The PSC has submitted copies of its 2008 through 2012 complaint logs to the FCC. The provider for Georgia Relay issues each complaint a Record ID number to enable the PSC and the FCC to quickly and easily identify the details of those particular complaints and contact information of the complainants.

> *(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:*
>
> > *(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;*

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and

(iii) The physical address to which correspondence should be sent.

The Georgia PSC submitted to the Commission a contact person for TRS consumer information and complaints about Intrastate TRS. The submission includes the name and address of the State office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, web address, and physical address to which correspondence should be sent. Following is the name of the contact at the PSC for those purposes:

Mr. Michael Russell, Utilities Analyst
Utilities Division, Georgia Public Service Commission
244 Washington Street, Atlanta, GA 30334
Tel (voice) 404-656-0995; FAX 404-656-2341;
E-mail: MIKERU@psc.state.ga.us
Web site http://www.psc.state.ga.us

The Hamilton Telephone Company d/b/a Hamilton Telecommunications, the provider of Georgia Relay, has submitted to the Commission a contact person for TRS consumer information and complaints about Hamilton's service. The submission includes the name and address of the state office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, and physical address to which correspondence should be sent. Following is the name of the contact at The Hamilton Telephone Company for those purposes:

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1006 12th Street
Aurora, NE 68818
Voice/TTY 402-694-3656
Fax: 402-694-5037
E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1,

2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Community Outreach, Public Relations and Educational Programs

Georgia Relay provides community and business outreach and promotes a public awareness campaign to educate all Georgia citizens about the relay service. These efforts educate and heighten public awareness of 7-1-1 and TRS throughout Georgia through marketing, advertising and community involvement. In compliance with FCC requirements, which call for outreach to all telephone users, Georgia Relay's outreach initiatives focus on the need to educate the hearing community. As it has been in the past, the primary outreach concern is the number of hearing people who hang up on relay calls. Through participation in promotional events, presentations, workshops and instructional seminars, Georgia Relay reaches out to all relay user communities and always adjusts its programs to meet the specific needs of every audience.

Georgia Relay's outreach and awareness efforts specifically target individuals who are deaf, hard of hearing, late deafened, deaf-blind or have difficulty speaking, as well as their family, friends and caregivers. Georgia Relay performs a variety of activities to inform the public about relay and regularly participates in activities held by Georgia organizations that serve relay users.

The outreach team offers informative presentations on the features of relay services to organizations, relay user groups, businesses, educators and students, health care providers, 9-1-1 call centers, emergency, fire and law enforcement personnel, libraries, senior centers, and public and private entities. Georgia Relay's statewide outreach and awareness efforts include:

- Presentations
- Exhibits
- 911 Education
- Strategies for reaching Hard to Reach Relay Users
  - Hard of Hearing and Elderly Strategies
  - Speech to Speech
  - Deaf Blind
- Outreach to Businesses and Educational Institutions
- Outreach to Spanish
- Equipment Distribution Programs
- Involvement of Deaf and State Agencies
- Customized Outreach materials
- Promotional Materials
- Variety of Brochures
- Description of Complaint Procedures in Printed Materials
- Bill Inserts and Directory Pages
- Newsletters
- TRS and CapTel Web sites
- Social Media
- Press Release and Public Relations
- Print Advertising

- Media Advertising

Please refer to Attachment B for sample outreach materials and a list of the outreach activities Georgia Relay has accomplished.

> *(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.*

Georgia Relay's provider performs no billing. All billing is performed by the relay users' carrier of choice for both intralata and interlata toll calls. Thus the relay users' carrier of choice bills all intralata and interlata toll calls at their applicable discounted rate for relay users. Georgia Relay's provider forwards the appropriate information digits identifying the call as a relay call to the carrier so that it can be identified as a relay call, rated and billed accordingly by the carrier. Each carrier providing long distance service to relay users is responsible to ensure that TRS users shall pay no greater than the rates paid for functionally equivalent voice communication services.

> *(5) Jurisdictional separation of costs —*
>
> *(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.*

Georgia Relay's provider presents the Interstate TRS Fund with a billing statement for all interstate minutes of relay in accordance with the requirements of the Interstate TRS Fund and consistent with FCC rulings. All intrastate minutes of use are compensated from the Georgia Relay Fund.

> *(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.606, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.*

Please refer to Tab 7, Method of Funding for a complete description of the State of Georgia's funding mechanism.

> *(6) Complaints —*
>
> *(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the*

program of such state under §64.606 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

The Georgia PSC will resolve all intrastate complaints within 180 days after the complaint is first filed with the State, regardless of whether the complaint is filed with the state relay administrator, a state PUC, the relay provider or with any other state entity.

(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

(2) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under §64.606.

The Georgia PSC understands that if it does not provide a resolution to a complaint that the FCC may exercise jurisdiction.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

The Georgia PSC understands that the Commission will resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) Complaint procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) Informal complaints —

(1) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable

means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) Service; designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) Review and disposition of informal complaints.

(1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on

the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

The Georgia PSC will assist as necessary in this process.

(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(4) The relief sought.

(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) Number of copies. An original and two copies of all pleadings shall be filed.

(F) Service.

(1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of §1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this

subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

The Georgia PSC will assist as necessary in this process.

Supplemental Information:
Intrastate Georgia Relay complaints are processed in the following manner for the PSC by its TRS provider:

Trained personnel located within the State of Georgia answer all Georgia Relay Customer Service calls. Georgia Relay provides a 24 hour a day, 7 days a week customer service via a toll-free telephone number, accessible from anywhere in the U.S., to assist TTY and voice callers with Georgia TRS inquiries and complaints. Customers may also contact Georgia Relay via e-mail and through the Georgia Relay web-site; in person; as well as in writing. Any caller to the relay center having a complaint can reach a supervisor or customer service representative while still on line during a relay call. Georgia Relay processes any complaints, which originate via e-mail, fax, telephone, regular mail, outreach events, at the workstations, etc.

Ultimately responsible for processing all inquiries, comments and complaints is Georgia Relay Customer Service department. The National Customer Service Manager, Center Manager and Vice President of Relay Service for Hamilton also view all complaint information.
In the event of a complaint regarding the Georgia Relay, trained staff will follow an established procedure of complaint resolution. This process varies depending on the gravity of the situation.

- A Complaint involving a Communication Assistant is directed to the Communication Assistant's Supervisor and the Lead Supervisor. Constructive feedback will be shared with the Communication Assistant and appropriate

coaching, re-training and counseling steps will be taken by the primary Supervisor to resolve the situation. Georgia Relay's detailed call records show each key command (not actual text) the CA makes. Georgia Relay can easily investigate Georgia Relay CA complaints and take disciplinary action when needed.

- Complaints regarding service/procedure issues are directed to the appropriate internal personnel. Technical issues are given to the technical support staff Georgia Relay uses and addressed immediately. Procedural issues are discussed at internal quality meetings.

All complaints are reviewed by the National Customer Service Manager to ensure that any complaints have been resolved to the customer's satisfaction. The Customer Service Team resolves most customer service complaints. If further action is needed, the complaint is escalated to the Vice President of Relay Service for Hamilton, and then to the Georgia PSC when needed. All complaints are resolved within 10 calendar days depending on the complexity of the problem. Georgia Relay describes the above procedures and FCC complaint processes, including contact information for both Georgia PSC and the FCC, in appropriate printed outreach material that is distributed to the general public.

If the user is not satisfied with the resolution of the complaint by Georgia Relay or with any action taken, Georgia Relay's monthly report to the PSC will so state. The user then has the opportunity and is given written notice of that opportunity by Georgia Relay to have the complaint and action of Georgia Relay reviewed by the PSC for such action as it may deem appropriate in accordance with its rules and regulation. The Georgia PSC will act on such complaint no later than 180 days from the filing of the complaint.

The Georgia PSC will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for the State of Georgia. The PSC will cooperate in the investigation or resolution of any and all complaints concerning the Georgia Relay with the Federal Communication's Commission.

> *(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.*

The contract between the PSC and The Hamilton Telephone company d/b/a Hamilton Telecommunications provide for the transfer of TRS customer profile data from Hamilton to the incoming TRS vendor. Hamilton will provide the above mentioned data to the new vendor at least 60 days prior to the conclusion or termination of the contract.

Hamilton does not and will not use this data for any purpose other than connecting the Georgia Relay user to his/her called party. Hamilton has not and will never make any relay information

available for sale or distribution. Hamilton will not sell, distribute, share or reveal in any way the information referenced above.

Georgia Relay
Dial 7-1-1

Tab 6
Exceeding FCC Minimum Standards

§ 64.606 Internet-based TRS provider and TRS program certification.

(a) Documentation —

(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

The State of Georgia is currently certified to provide intrastate TRS through July 26, 2013. This application is submitted to re-certify the State of Georgia for an additional five years.

(b)

(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

Please refer to the Operational Standards, Technical Standards and Functional Standards sections of this application for a description of how the State of Georgia meets or exceeds all operational, technical and functional minimum standards contained in §64.604.

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

Please refer to Tab 1 for a copy of the State of Georgia's rules and regulations governing telecommunications relay service. The Georgia PSC regulates the provision of telecommunications service in the State of Georgia and has established rules and procedures for service standards as well as complaint resolution and other necessary enforcement remedies. The contract entered into between the Georgia PSC and Hamilton Telephone Company provides that all state and federal laws shall be complied with. Failure to do so by Hamilton would be a breach-of-contract for which the Georgia PSC could terminate the agreement with Hamilton and seek such other remedies as may be available by law. Consumers also have the opportunity pursuant to the established rules

of the Georgia PSC to file complaints or petitions concerning the Georgia Relay Center requesting modifications in the provision of this service or otherwise resolving issues or concerns of the public.

> *(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes [that its program in no way conflicts with federal law].*

As demonstrated in the following section, where the Georgia Relay program exceeds the mandatory minimum standards contained in §64.604, Georgia Relay establishes that its program in no way conflicts with federal law.

Georgia Relay does exceed some of the mandatory minimum standards contained in Section 64.604 in terms of the following items:

CA Training and Procedures
Georgia Relay not only meets, but also exceeds FCC Communication Assistant standards in the areas of hiring and training practices, typing speed to accuracy and in-call replacement of CAs.

Ability to TYPE at 60 wpm
Georgia Relay Communication Assistants must TYPE 60 words per minute. **Georgia Relay exceeds this service level by requiring CAs to maintain a high accuracy level in addition to 60-wpm typing.**

Turbo Code
Georgia Relay exceeds the FCC requirement that TRS shall be capable of communicating with ASCII and Baudot formats, at any speed generally in use. Georgia Relay provides Turbo Code, a proprietary alternate protocol developed by Ultratec, as an enhanced protocol and has secured a license from Ultratec to use this protocol in its relay modems. Georgia Relay users are able to automatically connect "Turbo Code" on every relay call type. With Turbo Code, Georgia Relay users can use their Turbo Code Interrupt feature.

Intrastate Spanish
In addition to Interstate Spanish to Spanish, Georgia Relay provides Intrastate Spanish to Spanish, Spanish to English and English to Spanish call handling to the relay users of Georgia and processes all the same call types on its Spanish lines as it does on its English voice and TTY lines.

When recruiting and training bilingual CAs, Georgia Relay requires Spanish CAs pass a Spanish test, attend a Spanish orientation class and take all standard CA and Speech to Speech training prior to relaying Spanish to Spanish calls.

SS7 Signaling
The relay platform used by Georgia Relay has made use of SS7 signaling since February 2002. The Relay platforms have been retrofitted to deliver Caller ID in the same manner

that these services are delivered today in the public switched network (i.e. Georgia Relay provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

Captioned Telephone Service (CapTel)

Georgia Relay provides Captioned Telephone service 24 hours a day, 7 days a week, 365 days a year in a manner that is functionally equivalent to traditional voice calls. Captioned Telephone users place a call in the same way as dialing a traditional phone. As they dial, the CapTel phone automatically connects to a captioning service. When the other party answers, the CapTel phone user hears everything that is said, just like a traditional telephone call.

FCC Captioned Telephone Regulations and Waivers

The FCC has issued a separate Ruling specifically for Captioned Telephone: Declaratory Ruling on August 1, 2003 CC Docket No. 98-67, FCC 03-190 document. In this Ruling the FCC found that captioned telephone VCO service (Captioned Telephone Service is a form of this) is a type of TRS. In addition the FCC waived certain TRS mandatory minimum standards that do not apply to captioned telephone VCO service, and waived other TRS mandatory minimum standards for captioned telephone VCO (see list below). On July 14, 2005 the FCC clarified that Two-Line Captioned Telephone Service is a type of telecommunications relay service eligible for compensation from the Interstate TRS Fund.

Georgia's Captioned Telephone Service offering meets all FCC minimum standards.

The Declaratory Ruling referenced above serves as the primary source in meeting the existing minimum standards including waivers of the six TRS requirements for Captioned Telephone Services. The FCC issued an order on August 14, 2006 (CG Docket No. 03-123, DA 06-1627 document) making these temporary waivers permanent.

Captioned Telephone waivers include:

1. Speech to Speech (STS) and Hearing Carryover (HCO)
2. Communication Assistants waivers:

- TRS mandatory minimum standard requiring CAs to be competent in interpretation of typewritten ASL as applied to Captioned Telephone CAs.
- CA oral-to-type test requirement and permit the use of an oral-to-text test instead for Captioned Telephone CAs.
- Requirement that CAs not refuse single or sequential calls as applied to Captioned Telephone CAs handling outbound Captioned Telephone calls.
- Gender preference.
- 60 wpm mandatory typing speed for CAs.

3. Interrupt Functionality
4. Call Release
5. ASCII and Baudot Format

Captioned Telephone Training
All Captioned Telephone CAs are required to satisfactorily complete a series of skills assessments to achieve the expertise and knowledge to adequately and accurately caption in a professional manner the words spoken by the hearing party without intervening in the communication between the parties. The evaluation process includes the quality of voice, clarity of speech and correct use of words and sentence structure.

A detailed CA training plan is in place to ensure that all standards as applied by the FCC to the provision of Captioned Telephone are met by each Captioned Telephone CA. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group.

After initial training, Captioned Telephone trainees are tested through the administration of timing scripts in a test environment. Each CA is required to successfully pass two rounds of timings consecutively prior to handling live calls. In addition, trainees are required to meet specified monitor scores when being evaluated on live call processing. Captioned Telephone Captionists are monitored daily and if a Captionist fails a monitoring, they are not allowed to process live calls until they are able to pass monitoring.

Captioned Telephone Ongoing Training
All Captioned Telephone CAs receive all necessary ongoing training. CAs are monitored on each shift and if they are found to need additional training or re-training, they are taken off line and given the necessary training. In addition, CAs are retrained on new features and capabilities of CTI's Captioned Telephone service platform including any new or improved voice recognition systems used in the platform.

CAs are tested monthly through the administration of Timing Scripts in a test environment. In addition, CAs are periodically monitored while processing live calls. Only the scores of each CA are maintained in a database. No other information regarding conversations is kept at any time.

Captioned Telephone Quality Assurance
One way that quality is measured is through the CA testing program which requires a proficiency level for Captioned Telephone CAs of 130 WPM speed of transcription with a 2% or less Error Rate and 98% accuracy requirement in a testing environment.

Captioned Telephone Service CAs adhere to the following minimum standards:
- The Captioned Telephone CA is trained to caption the words spoken by the hearing party as accurately as reasonably possible without intervening in the communications. The CA is permitted to provide background noise identification;
- The Captioned Telephone CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential;
- The Captioned Telephone CA shall be required to meet the FCC standards for TRS minimum transcription speed;
- The Captioned Telephone CA shall not limit the length of a call and shall stay with

the call for a minimum of ten minutes when answering and placing a call;

- The Captioned Telephone CA shall pass along a Captioned Telephone caller's ANI to the appropriate PSAP if the caller disconnects before being connected to emergency services;
- Captioned Telephone personnel have the requisite experience, expertise, skills, education, knowledge and training to perform Captioned Telephone Services in a professional manner.

Captioned Telephone Confidentiality Agreement

All Captioned Telephone CAs adhere to strict policies of confidentiality, which comply with all FCC confidentiality requirements. Georgia's Captioned Telephone provider collects only that personal information necessary to provide and bill for the Captioned Telephone service being rendered. Captioned Telephone CAs are also prohibited from intentionally altering a relayed conversation. Following is a Confidentiality Agreement that all CAs are required to sign prior to taking any live calls.

The success of Captioned Telephone depends on quality and complete confidentiality. All Captionists understand and abide by the confidentiality policy.

CAs do not discuss the contents of captioned calls, any caller identifying factors, calling points, or other information about captioned calls other than what is necessary to train other CAs. The CapTel call center is isolated to assure confidentiality standards are upheld. The equipment and structural accommodations made to the CA workspace ensure the confidentiality of Captioned Telephone User's calls, and prevent the Captioned Telephone Users on one call from overhearing a CA processing another call.

Confidentiality Policy

- I will not disclose to any individual (outside of a member of the CapTel management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any Captioned Telephone call.
- I will not act upon any information received while processing a Captioned Telephone call.
- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at CapTel Inc.
- I will not share any information about Captioned Telephone calls with anyone except a member of the CapTel Inc. management staff in order to investigate complaints, technical issues, etc.
- I will continue to hold in confidence all information related to the work and calls I have performed while at CapTel Inc. after my employment ends.
- I will NOT reveal my Captionist ID number in conjunction with my name unless asked by a member of the CapTel Inc. management staff.
- I will not share with anyone any technical aspect of my position at CapTel Inc. unless asked by a member of the CapTel Inc. management staff.
- I will not talk about consumers or call content with any fellow Captionists.
- I will not listen to or get involved in calls taken by fellow Captionists.

I have read the above Confidentiality Policy and understand a breach of confidentiality will result in disciplinary action up to and including termination of employment at CapTel, Inc. I recognize the serious and confidential nature of my position and therefore promise to abide by these guidelines.

Employee Name_____

Date_____

Types of Calls
Captioned Telephone CAs are prohibited from limiting the length of a call and are required to stay with a call for a minimum of ten minutes when answering and placing a call. Captioned Telephone transmits conversations between callers in real time. Georgia Captioned Telephone is capable of handling any type of call normally provided by telecommunications carriers, except for those types of calls and call functionality that specifically been waived for Captioned Telephone Services.

Change of Captioned Telephone CA
Georgia Captioned Telephone is in compliance with the FCC rule which requires that the CA shall stay with a relay call for a minimum of ten minutes.

The situations in which a CA would change during a call would include:
1) More than 10 minutes past scheduled break or lunch time
2) More than 10 minutes past the end of a shift
3) CA is observed having extreme difficulty processing the call
4) Call has been in progress more than 30 minutes with difficult call content or speed, or 60 minutes or more of an average call

The change of CA is handled through a supervisor who approves the change, finds an available CA to exchange, and issues the Call Take Over. When a change occurs, the new CA is identified to the Captioned Telephone user. Just prior to the change in CA a message is sent to the Captioned Telephone user indicating there will be a change in CA. After the change, a new message is sent with the new CA number indicating they have taken over the call. This way the client can choose to stop the standard phone user from talking for a moment until the new CA is fully in place. The change attempts to take place while the client is speaking so that the least amount of information to caption is lost.

Dialing 911 in an Emergency – Two-Line Captioned Telephone
When calling 911 in emergency situations using 2-Line Captioned Telephone, one line is routed directly to the appropriate 911 center and the second line is routed through the captioning center. This allows the user to receive captions on one line and hear the conversation on the other line. The 911 center receives the caller's ANI information directly from the network in the same way as a non-Captioned Telephone call.

Dialing 911 in an Emergency – Single Line Captioned Telephone
When calling 911 in emergency situations, the single line Captioned Telephone users' call is automatically routed to the appropriate 911 center because the call was placed from the user's home line. 911 calls are **not** routed through the captioning service. This means:

- There are no delays in accessing emergency personnel, as calls are directly connected to a 911 call center.
- Emergency 911 calls are **not** captioned in the same manner that regular Captioned Telephone calls are because the call is not routed through the CapTel Captioning Service.

- The Captioned Telephone user speaks directly into the handset, as with any other Captioned Telephone call. The 911 call-taker will hear everything the Captioned Telephone user says. The Captioned Telephone user is not be able to hear the call taker, but the dispatcher can type instructions on a TTY, which will appear on the Captioned Telephone display screen.
- Emergency 911 Services will know the ANI of the caller and be able to locate the individual and send appropriate help, based on the location from which the Captioned Telephone call is placed.

Captioned Telephone Answer Performance
Georgia's Captioned Telephone answers 85% of calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in queue or on hold.

Georgia's Captioned Telephone provider ensures that adequate staffing is supplied to provider Captioned Telephone users with an average answer speed of 85% of all calls answered within 10 seconds on a daily basis including abandons. As an experienced Captioned Telephone provider, Georgia's Captioned Telephone provider communicates with CTI frequently to project future demand so all standards can be met.

Georgia ensures that services standards relating to answer speed are met including during those times of increases or spikes in call volume. CTI tracks the number of CapTel phones distributed to users. Combing this with an average length of each call allows CTI to predict the number of Captioning Assistants that are needed. CTI provides adequate trunking capacity, CA workstations, personnel staffing, and equipment capacity to meet the current standard of 85% of all calls answered within 10 seconds on a daily basis. Abandoned calls are included in the speed of answer calculation. CTI also has reporting mechanisms and alarm systems to detect and record failures.

Georgia ensures compliance with the P.01 customary TRS industry standard for blockage. Georgia's Captioned Telephone provider commits to ensuring that no more than one call in 100 will receive a busy signal when calling the Captioning Center at the busiest hour.

Captioned Telephone Facilities
Captioned Telephone Services are provided from several locations. CTI's CapTel Service Relay Centers located in Madison, WI and Milwaukee, WI. Georgia's Captioned Telephone provider, Hamilton Relay, also processes Captioned Telephone calls from its own Call Centers located in Aurora, Nebraska; Baton Rouge, Louisiana; and Frostburg, Maryland.

Georgia ensures that Captioned Telephone Service is available 24 hours per day, 7 days per week, and 365 days per year. CTI has the needed redundancy in switching mechanisms and telecommunications facilities to ensure operation 24 hours a day.

Each CapTel Center is equipped with redundant systems for power. The CapTel Centers utilize a combination of battery backup, commercial UPS supply, and/or auxiliary

generator to supply uninterruptible power to the CapTel Center for extended periods of time. Redundant systems for power include ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

The CapTel switching system includes a redundant Central Processing Unit (CPU) on "hot stand-by" to ensure that no calls are dropped due to processor failure, a full Maintenance and Administrative Terminal with keyboard, screen and printer capabilities, on-line monitoring, real time programming capabilities which does not take the system off-line, and an inventory of spare critical components which are maintained on site to ensure the required levels of service are met

It is also important to ensure that equipment and technology is tested and upgraded frequently. Hamilton and CTI communicate frequently and review plans to ensure redundancy, including: replacing servers with ones that have lower power requirements, allowing for longer power if back-up power is needed; deploying new servers which allow for more robust monitoring to see any signs of trouble before it would affect call processing; and deploying all servers and core switching fear are on a SONET fiber ring at each location.

True Caller ID via Captioned Telephone

Georgia's Captioned Telephone provider offers FCC compliant Caller ID services. The FCC has required that when a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party. Georgia's Captioned Telephone provider has been providing True Caller ID which passes along the 10-digit number of the person calling since August 1, 2005.

The actual identity of the Calling Party is presented to the Called Party's Caller ID box (True Caller ID). With True Caller ID, the Called Party may not know that they received a call via the Captioned Telephone service. Also if the Calling Party blocks their Caller ID, the Called Party does not receive any Caller ID information, functionally equivalent to a normal telephone call. Caller ID information of the Called Party is shown on the CapTel display screen.

Three-way Calling via Captioned Telephone

Georgia's Captioned Telephone provider offers FCC compliant Three-way calling. A standard telephone user can initiate a three-way call to a Captioned Telephone user. For example, two standard phone users are on a call. The party with three-way calling feature on his/her phone line would hook flash to put the other person on hold, and would then dial the national Captioned Telephone voice number and give the CA the Captioned Telephone user's telephone number or dial the Captioned Telephone user direct if a 2-Line Captioned Telephone user. All three parties would then be joined and the Captioned Telephone user would receive captions on the call.

With 2-Line Captioned Telephone, the Captioned Telephone user can initiate a Three-way call in the same manner that a standard phone user would. The first line works exactly as a regular phone line (able to add another caller) and the second line supports the captions.

Call-Waiting via Captioned Telephone
Call-waiting is supported by 2-line Captioned Telephone. When the Captioned Telephone user hears (or reads in the captions) the "beep" telling him/her a second call is coming in, the party would simply press the FLASH button on their CapTel phone. The Captioned Telephone user's second caller will be on-line, and the Captioned Telephone user will receive captions of the conversation. The Captioned Telephone user will still receive captions of their first conversation, if/when they return to the first caller by pressing the FLASH button again.

No charges will be assessed to Captioned Telephone users for these local exchange non-basic services beyond what the user pays their LEC for these services.

Speed Dialing via Captioned Telephone
Georgia's Captioned Telephone provider offers speed dialing, which is built into the CapTel phone's Dialing Directory. To use this feature, the Captioned Telephone user saves the desired phone numbers in the CapTel memory. To speed dial a number in memory, the user simply presses the button next to the "Memory Dial/Redial" arrow. A list of saved numbers and the last number dialed is then displayed. The user then presses the button next to the number they wish to dial again and Captioned Telephone dials the number automatically.

711 via Captioned Telephone
Georgia's Captioned Telephone provider has implemented a procedure for voice to Captioned Telephone that allows voice consumers to call a Captioned Telephone user by dialing 711 rather than the Captioned Telephone 800 number. Voice users can use this on a per-call basis or as an option on the Customer Profile.

Spanish Captioned Telephone
Georgia's Captioned Telephone provider offers Intrastate and Interstate Spanish Language Captioned Telephone services. Spanish Captioned Telephone hours are from 7:00 a.m. to 11:00 p.m. Central Time. To use Spanish Captioned Telephone, the user selects the Spanish option under the menu settings. Once this setting is selected, calls will automatically route to a Spanish captioning CA. Voice users will dial the Spanish toll-free access number to call a Spanish Captioned Telephone user and have the call captioned in the Spanish language.

Using Automated (Touchtone) Systems via Captioned Telephone
With Captioned Telephone, customers can easily receive and/or leave messages on answering machines or voice mail systems with automated menus.

The Captioned Telephone user can press the Captioned Telephone number buttons at any

time during a call to make selections. This makes navigating automated systems easy.

The Captioned Telephone user can press a button as soon as they are ready to make a selection. The captioning service continuously transcribes what is heard regardless of what the Captioned Telephone user is saying or which buttons they press.

Some automated systems have very short response times which may disconnect the call. If this happens, the Captioned Telephone user will simply hang up and try the call again.

Leaving Messages on Answering Machines via Captioned Telephone
The Captioned Telephone user may begin leaving their message as soon as they see "BEEP" on the display screen or hear the recorded greeting end.

If no further information is received, the Captioned Telephone user may assume their message was recorded. If the answering machine is capable of confirming that a message was left, the Captioned Telephone user will see the confirmation message on the Captioned Telephone display.

Retrieving Voice Mail Messages via Captioned Telephone
The Captioned Telephone user simply calls into their voice mail/answering machine system as a remote caller, and follows the voice mail/answering machine prompts to retrieve the messages.

The Captioned Telephone user can press the number buttons at any time.

Captioning External Answering Machine Messages via Captioned Telephone
Captioned Telephone users can receive captions of voice messages left on an answering machine that is near the CapTel phone by playing the messages aloud by following these instructions:

1. With the handset hung up, press the menu button until "Caption External Answering Machine Messages" is displayed.
2. Press the button next to "OK".
3. Pick up the CapTel handset and place the handset mouth piece next to the answering machine speaker. Make sure the handset mouthpiece is close enough to "hear" the messages as they are played aloud.
4. In this mode, Captioned Telephone will automatically dial the captioning service. Watch the display to see when a connection is established.
5. Start playing the voice messages aloud on your external answering machine. Watch the CapTel display to see captions of the voice messages.
6. Save or delete voice messages directly on the answering machine. When you are finished, hang up the CapTel handset. The "Caption External answering Machine Messages" feature will go off automatically.

Captioned Telephone End User Billing
Captioned Telephone users can utilize alternate billing arrangements; for example, collect, third number, person to person, calling card, credit card, and 900 number

services.

Captioned Telephone users are not charged for use of the service. All local calls are provided free of charge to the consumer. All billing is performed by the customer's long distance carrier of choice. All billing information is routed to the customer's carrier during the outbound call setup. The carrier provides accurate billing to the customer using the same process used for regular non-Captioned Telephone calls.

All interstate calls, including out of state long distance and international calls are billed to the Interstate TRS Fund. Jurisdiction information is captured while the call is in progress and recorded in the CDR. This information is passed to the Captioned Telephone user's carrier of choice during the outbound call set-up for accurate billing to the Captioned Telephone user.

Captioned Telephone Carrier of Choice

Georgia's Captioned Telephone provider ensures that Captioned Telephone users will have the ability to access their chosen carrier of choice for intrastate or interstate interexchange carrier calls without regard to what CapTel phone they may call from to the same extent such access can typically be made by a TRS user (such as using 10-10-XXXX to access carrier of choice).

Georgia's Captioned Telephone provider informs Captioned Telephone users of the need to designate a long distance carrier for long distance Captioned Telephone calls and the consequences of not making such a designation through a variety of methods including customer service, newsletters, the website, etc.

If a customer needs to make long distance calls with Captioned Telephone, they must register their existing long distance service or calling plan with Captioned Telephone Customer Service to ensure that any long distance charges are billed under their current long distance provider.

If they do not register a preferred long distance provider with Captioned Telephone, any long distance captioned calls they make will be automatically billed by Georgia's TRS long distance carrier, at their long distance rate (which varies by state). There is no charge to customers for using the CapTel captioning service.

Customers can complete a Captioned Telephone Database Profile Request in order to specify their long distance carrier of choice. Customers can also designate their carrier of choice via the Captioned Telephone website or by calling Customer Service. Customers simply indicate which carrier they want to use.

Georgia's Captioned Telephone provider has the ability to accurately determine call jurisdiction information in order to ensure that callers have access to extended community calling plans, optional calling plans and other special situations to the same extent provided by traditional relay service by delivering the call to the user's chosen IXC.

Directory Assistance via Captioned Telephone
Georgia's Captioned Telephone provider offers access to directory assistance to the same extent directory assistance is offered to Traditional TRS users. The Captioned Telephone user's carrier of choice bills for interlata and intralata directory assistance calls at their tariffed rate. All billing is performed by the customer's carrier. The call is then processed like all other Captioned Telephone calls.

(c)

> *(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.*

The State of Georgia is currently certified to provide intrastate TRS. The State of Georgia is requesting certification beginning July 26, 2013, continuing for a five-year period.

d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

Please refer to **Tab 7 Method of Funding** for a complete description of the State of Georgia's funding mechanism.
(e)

> *(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.*

The Georgia Relay program has never been suspended or revoked and will continue to meet all FCC requirements necessary for certification.

(f) Notification of substantive change.

> *(1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet Federal minimum standards after implementing the*

substantive change.

Georgia Relay understands and will notify the Commission of substantive changes in its TRS programs within 60 days of when they occur, and will certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

By this application the PSC intends that the operation of the Georgia Relay will continue to be in compliance with the Federal Communication Commission rules and orders regarding telecommunications relay service. If there is any technical or substantial variation discovered by the Federal Communication Commission that would cause or could cause the Georgia Relay to be out of compliance, the PSC agrees to take such action as may be reasonably required to bring the Georgia Relay into compliance.

Georgia Relay
Dial 7-1-1

Tab 7
Method of Funding

Method of Funding

The Commission, in accordance with the provisions of Senate Bill 591 and O.C.G.A. 46-5-30, is directed to establish, implement, administer and promote a state-wide single provider Telephone Relay System operating seven days per week, 24 hours per day and contract for the administration and operation of such relay service.

The provider of this relay service shall provide the following basic services for local and intrastate toll calls:

A. Accept a call from a Telecommunications Device for the Deaf (TDD) or computer equipped caller, place a call to a hearing and voice-capable individual and translate the electronic messages to voice messages and the voice messages to electronic messages in order to complete the communications link; and

B. Accept a call from a hearing and voice-capable caller, place a call to a TDD or computer-equipped individual and translate the voice message to electronic messages and electronic messages to voice messages in order to complete the communications link.

C. Impose a monthly maintenance surcharge (except for telephone membership corporations) of $0.05 on all residential and business local exchange access facilities. "Exchange access facility" means the access from a particular telephone subscriber's premise to the telephone system of a local exchange company and includes local exchange company provided access lines, private branch exchange trunks and centrex network access registers, all as defined by tariffs of telephone companies as approved by the Commission.

D. Collect the Telephone Relay System surcharges (except for telephone membership corporations) on a monthly basis and hold these surcharges in a special fund within that carrier which shall be solely for the provisions of the Telephone Relay System and not includable in gross receipts subject to franchise tax allowed pursuant to the O.C.G.A. 36-34-2 or subject to the sales and use taxes levied under O.C.G.A. Chpater 8 of Title 48. Transfer monthly on the last business day of each month all of such collected surcharges monies to the Fund Administrator retained by the service provider. Any interest earned by the local exchange companies on the special fund surcharge monies due to billing cycles, due date, and other factors shall be remitted to the Fund Administrator retained by the service provider. Local exchange companies may deduct and retain two (2) percent of the total surcharge collected each month for billing, collection, inquiry and administration costs associated with the surcharge.